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August 21, 2003

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Ms. Janice Bivens  
Enforcement Officer (6SF-AC)  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Gulfco Marine Maintenance, Inc.  
Freeport, Texas

Dear Ms. Bivens:

The undersigned represents Chromalloy American Corporation and we are responding to the March 11, 2003, notice of potential liability and request for information which EPA Region 6 sent to Chromalloy American Corporation and Sequa Corporation.

We have been and are continuing to investigate this site and its history. Based upon information obtained thus far, we respond as follows:

A. Please explain corporate relationships, if any, of your company and your related companies, to other parties listed on Enclosure "A" of this letter. Please provide copies of documents showing these relationships, if they exist.

Response:

Gulfco, Inc. was a Texas corporation. Mr. B.L. Tanner was its president and sole stockholder. About October 24, 1975, Gulfco, Inc. was merged into Chromalloy American Corporation, a Delaware corporation, per the enclosed Articles of Merger.

On or about November 17, 1979, Chromalloy sold the Gulfco assets and property to Fish Engineering & Construction, Inc., a Texas corporation.

On December 23, 1986, Chromalloy American Corporation merged with and into CRO Acquisition Corporation, a wholly-owned subsidiary of Sun Chemical Corporation, and CRO Acquisition Corporation then changed its name to Chromalloy American Corporation. Sun Chemical Corporation subsequently changed its name to Sequa Corporation. However, Sequa Corporation and Chromalloy American Corporation are

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separate and distinct entities; for purposes of this matter, Chromalloy American Corporation is the only party in interest.

B. Were there any pits located on the site when it was purchased by your company or your related companies? If your answer is "yes," please answer the following questions concerning these existing pits:

Response:

We believe so, but information sufficient to answer the subparts is unknown at this time. Further, we are still investigating whether Chromalloy owned or merely leased any or parts of the subject site.

C. Did your company or related companies hold, store, process, treat, or dispose of any hazardous material(s) at the site? If the answer to this question is "yes," please answer the following questions:

Response:

We believe so, but information sufficient to answer the subparts is unknown at present. Further, we are still investigating whether Chromalloy owned or merely leased any or parts of the subject site.

With best regards, I am

Very truly yours,



F. William Mahley

FWM/ksb

Enclosure

cc: Mr. Myron O. Knudsen, P.E. (w/enclosure)  
Director  
Superfund Division  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733